



**American Water Works
Association**

Dedicated to the World's Most Important Resource™

Government Affairs Office
1300 Eye Street NW
Suite 701W
Washington, DC 20005-3314
T 202.628.8303
F 202.628.2846

April 29, 2019

Tina Bahadori
Director, National Center for Environmental Assessment
U.S. Environmental Protection Agency
EPA Docket Center (ORD Docket)
Mail Code: 28221T, 1200
Pennsylvania Avenue NW
Washington, DC 20460

RE: Availability of the Systematic Review Protocol for the Hexavalent Chromium (Cr(VI)) Integrated Risk Information System (IRIS) Assessment, Docket ID No. EPA-HQ-ORD-2014-0313

Dear Ms. Bahadori,

The American Water Works Association (AWWA) appreciates the opportunity to review the materials provided on the U.S. Environmental Protection Agency's Systematic Review Protocol for hexavalent chromium (Cr(VI)). AWWA has a long-standing interest in the Integrated Risk Information System (IRIS) Assessment for Cr(VI) as re-evaluation of the Safe Drinking Water Act standard for total chromium relies on IRIS completing its assessment.^{1, 2} The EPA assessment will also be informative for state decision-making and local communication to customers.³ Timely completion of the IRIS Cr(VI) process is important to the water sector.

The Protocol description of the extensive evaluation, particularly of data quality, appears to be a sound and informative process.

As pointed out in AWWA's 2014 comments, problem formulation is an essential initial point, and has not yet been adequately addressed.

While improved over the 2014 docket materials in ways that are responsive to some of AWWA's earlier comments, the current Systematic Review Protocol does not fully describe:

¹ AWWA, Comment Letter, Docket ID: EPA-HQ-ORD-2012-0830-0020, June 25, 2014.

² EPA, Chemical Contaminant Summaries for the Third Six-Year Review of Existing National Primary Drinking Water Regulations, EPA 810-R-16-004, November 2016.

³ California OEHHA, Review of Hexavalent Chromium Public Health Goal, October 2016, Information available at <https://oehha.ca.gov/water/cnr/initiation-risk-assessments-chemicals-drinking-water-2016> on April 10, 2019.

1. Drinking water exposure to Cr(VI), e.g., the distribution of observed concentrations.
2. The relative contribution of Cr(VI) exposure from anthropogenic vs natural sources and the associated implications for risk management.
3. The specific risk-assessment work products the analysis is intended to provide.

There are more than 16,600 references in EPA's Health & Environmental Research Online (HERO) database making it critical that EPA organize its literature review so that any subsequent analysis is based on high quality studies reflecting the most current relevant science.⁴ Given the evolution of this risk assessment, AWWA requests that EPA more clearly describe how the current comment period will inform the IRIS program process for preparing the draft Cr(VI) risk assessment.⁵ AWWA recommends that EPA re-compile its assessment of the literature including more recent research as implied but not clearly stated in the Protocol document.⁶ Given the intervening five years and research conducted since the 2014 assessment AWWA strongly urges EPA to incorporate the newer literature.

EPA should and is, following a deliberate process to assess the risk posed by Cr(VI). It is important to realize that other nations have conducted their own assessments. Health Canada conducted its own review of Cr(VI) toxicity when exposure is via drinking water.⁷ The Health Canada analysis is captured in Table 4 of the Systematic Review Protocol; that analysis should be given due consideration by EPA.

The Protocol acknowledges that the analysis will evaluate a range of health endpoints of concern in order to develop a risk assessment. As this risk assessment has developed over more than a decade, EPA should carefully consider recent research and use the best available data to make the Agency's mode of action selection so as to ensure the credibility of the draft assessment.

Thank you for your consideration of AWWA's comments. If you have any questions or would like to discuss these comments, please contact me or Steve Via at (202) 326-6130 or svia@awwa.org.

Best regards,



G. Tracy Mehan, III
Executive Director for Government Affairs

cc: James Avery, EPA/ORD/NCEA

⁴ EPA, HERO, Information available at https://hero.epa.gov/hero/index.cfm/project/page/isws/false/search/true/project_id/2233/format/grid on April 9, 2019.

⁵ EPA, IRIS Assessment Development Process, Information available at https://www.epa.gov/sites/production/files/2015-09/iris_process_figure_2015.jpg on April 9, 2019.

⁶ EPA, Preliminary Materials for the Integrated Risk Information System (IRIS) Toxicological Review of Hexavalent Chromium Part 1: Experimental Animal Studies, EPA/635/R-14/094, April 2014

⁷ Health Canada, Chromium in Drinking Water, March 2016. Available at <https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidelines-canadian-drinking-water-quality-guideline-technical-document-chromium-profile.html> on April 9, 2019.

Jennifer McLain, EPA/OW/OGWDW

Lisa Huff, EPA/OW /OGWDW

Elizabeth Behl, EPA/OW/OST

Lisa Strong, EPA/OW/OST

Who is AWWA

The American Water Works Association (AWWA) is an international, nonprofit, scientific and educational society dedicated to providing total water solutions assuring the effective management of water. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our membership includes more than 4,000 utilities that supply roughly 80 percent of the nation's drinking water and treat almost half of the nation's wastewater. Our 50,000-plus total membership represents the full spectrum of the water community: public water and wastewater systems, environmental advocates, scientists, academicians, and others who hold a genuine interest in water, our most important resource. AWWA unites the diverse water community to advance public health, safety, the economy, and the environment.